

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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CHEVRON CORPORATION,	:
	:
Plaintiff,	:
	:
v.	:
	:
STEVEN DONZIGER, et al.,	:
	:
Defendants.	:
	X

11 Civ. 0691 (LAK)

**DECLARATION OF ANNE CHAMPION
IN SUPPORT OF CHEVRON CORPORATION'S OPPOSITION TO DONZIGER'S
MOTION TO STAY ENFORCEMENT OF CONTEMPT ORDER (DKT. 2234)**

I, ANNE CHAMPION, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am an attorney licensed to practice law in the State of New York and before this Court. I am a partner at the law firm of Gibson, Dunn & Crutcher LLP and counsel of record for Chevron Corporation (“Chevron”) in this matter. I make this declaration, based on personal knowledge, in support of Chevron Corporation’s Opposition to Donziger’s Motion to Stay Enforcement of Contempt Order (Dkt. 2234). If called as a witness, I could and would testify competently as to the content of this declaration.

2. Attached hereto as **Exhibit 1** are slides capturing information from Exhibit E and G to the Champion Declaration in Support of Chevron Corporation's Statement Regarding Steven Donziger and Donziger & Associates, PLLC's Contempt of the Forensic Inspection Protocol (Dkts. 2230-5, 2230-7), as well as Exhibit 2 hereto. These slides illustrate the following information contained in those exhibits: the computer Donziger stated under oath he has been using

since 2012 was not registered with Apple until 2015; Donziger purchased in late 2011, but did not disclose, an iPad 2; there are six phone numbers associated with Donziger's AT&T account, four of which his wife testified that she did not recognize; the usage pattern of the phone numbers other than the X2526 number (Donziger's public number) suggest that at least one additional device was in use by Donziger since October 3, 2008—contradicting Donziger's declaration which conveys that he had a single number and a series of lost or damaged phones associated with that number; Donziger had multiple accounts that he did not disclose, including two iCloud accounts.

3. Attached hereto as **Exhibit 2** is a true and correct copy of six documents, each titled "Wireless Subscriber Information," which were produced by AT&T and bear Bates Numbers ATT_PJD_00008762–67. These documents indicate the date ranges during which the phone numbers associated with Donziger's AT&T account were active.

Executed on this 17th day of June, 2019 at New York, New York.

/s/ Anne Champion
Anne Champion